

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:18-CR-00452-FL-1

UNITED STATES OF AMERICA

v.

LEONID ISAAKOVICH TEYF

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**DEFENDANT LEONID TEYF'S
PROPOSED VOIR DIRE**

Defendant Leonid Isaakovich Teyf, through undersigned counsel, pursuant to Rule 24(a) of the Federal Rules of Criminal Procedure, respectfully submits these proposed voir dire questions. In addition to the questions regularly asked by the Court, Defendant requests that the following questions be asked to prospective jurors:

1. Some people believe that merely because the government charges an individual with a crime, that person must be guilty of something or must have done something wrong, or else that person would not have been charged. Do any of the prospective jurors share this view?
 - (a) If so, you must understand that this view is contrary to the presumption of innocence required by our Constitution. Can you honestly put your belief aside completely, treat the defendant as innocent unless proven guilty beyond a reasonable doubt, and find him not guilty if the government fails to meet this standard?
2. This case involves allegations of money laundering. Do any of you have any work experience or training in the field of banking?

3. This case also involves allegations of immigration fraud. Do any of you have any experience or feelings about the subject of immigration such that you cannot begin the trial with a clean slate, that is, without strong feelings about that subject one way or the other?
4. Have any of you ever traveled extensively in Europe or Russia?
5. Do any of you have any experience doing business in Europe or Russia?
6. This case involves witnesses and parties who came here from Russia. Do you have any experiences with people from Russia, or beliefs or feelings about Russia, that would affect your ability in any way to begin this trial with a clean slate toward each side?
7. Please provide a history of your employment as an adult.
8. Have you ever been employed in law enforcement? Has any member of your family or close friend ever been employed by law enforcement? If so, in what role, what agency, when and for how long? Would you give more or less weight to the testimony of a law enforcement officer simply because of their status as a law enforcement officer?
9. Have you ever been a witness, for either the prosecution or the defense, in a criminal proceeding in either state or federal court?
 - (a) If so, for whom did you did you testify and what was the nature of your testimony?
 - (b) Would that fact has any bearing on your ability to determine if the government has proven the charges it alleges beyond a reasonable doubt?

10. Has anyone, or a member of your family or a close friend, been the victim of a crime?
- (a) If so, without getting into specifics, what was the general nature of the crime?
- (b) Would that have any impact or bearing on your ability to be fair to both the defendant and the government in this case?
11. Are you involved in any community or civic organizations?
- (a) If so, what are the names of the organizations? Have you held any leadership positions in the organizations?
12. In your professional career, have you ever held a position where you were the manager of an office or business, or supervised more than five (5) employees? If so, please describe the job, how long you held the job, and the general nature of your duties.
13. Have you ever been a party to a court case, either civil or criminal?
- (a) If so, state the nature of the case, whether you were the plaintiff or a defendant, and whether you were satisfied with the outcome of the case.
14. Have you, or any member of your family, ever worked for any branch of the federal or state government? If so, in what position, about when, and for how long?
15. Do you follow the news? If so, what are your primary news sources?
16. This case involves witnesses and a defendant who came here from Russia. Does anyone have opinions or views or feelings about Russia or Russian people?
17. The law requires that a jury may find a person guilty of a crime only if the government proves all of the elements of the crime by proof beyond a reasonable

doubt. Can you follow this law? If the government fails to convince you that it has proven the charges in this case by proof beyond a reasonable doubt, will you have any hesitation at all about returning a verdict of not guilty?

18. Is there anything else about you or your life experiences that you think it may be important for the parties to know before you are considered for jury service in this case?

Respectfully submitted, this the 3rd day of February, 2020.

/s/ F. Hill Allen
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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of February, 2020, I electronically filed the foregoing **DEFENDANT LEONID TEYF'S PROPOSED VOIR DIRE** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

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